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Attorneys for Defendant
BLUE CHIP COMMERCIAL CLEANING 2000, INC.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MARY A. POOL,

Plaintiff,

v.

MACY'S RETAIL HOLDINGS LLC., a Foreign
Limited Liability Company; BLUE CHIP
COMMERCIAL CLEANING 2000, INC., a
foreign corporation; DOE EMPLOYEES I
through X, inclusive; DOES I through X,
inclusive; and ROE CORPORATIONS I through
X, inclusive,

Defendants.

CASE NO.: 2:22-cv-00050-JCM-NJK

**STIPULATION AND ORDER TO
CONDITIONALLY EXTEND
DISPOSITIVE MOTION DEADLINE
AS TO DEFENDANT BLUE CHIP
COMMERCIAL CLEANING 2000,
INC.**

(FOURTH REQUEST)

IT IS HEREBY STIPULATED AND AGREED UPON, by and between Plaintiff,
MARY A. POOL ("Plaintiff") and Defendant, MACY'S RETAIL HOLDINGS LLC
("Macy's"), and Defendant, BLUE CHIP COMMERCIAL CLEANING 2000, INC. ("Blue
Chip"), and by and through their respective undersigned counsels of record hereby jointly
stipulate to conditionally extend the dispositive motion deadline for Blue Chip as set forth
below.

A. Discovery Plan:

Deadline to File Dispositive Motions July 7, 2023

B. Local Rule 26-3 Statement:

Pursuant to Local Rule 26-3, the Parties provide the following statement in support of its stipulation to briefly continue the aforementioned dates:

(a) Discovery Completed: The Parties have completed all discovery, which is now closed.

(b) Discovery to be Completed: There is no discovery to be completed.

(c) Reasons Why Dispositive Motion Deadlines to be Extended: The Deposition of Blue Chip's FRCP 30(b)(6) witness occurred on June 12, 2023. After the deposition and given facts and information discussed at the deposition, counsel for Plaintiff and Blue Chip engaged in settlement negotiations, which reached a final agreement to resolve Plaintiff's claims against Blue Chip and dismiss Blue Chip from this action on June 26, 2023. Blue Chip intends to file a motion to confirm that the settlement is in good faith pursuant to NRS 17.245 (the "Good Faith Settlement Motion").

If the Good Faith Settlement Motion is not granted, then Blue Chip would file a motion for summary judgment seeking dismissal of all claims against it. The Good Faith Settlement Motion cannot be heard or granted prior to the July 7, 2023 dispositive motion deadline.

C. Good Cause to Extend the Deadline

Pursuant to LR 26-3, any motion or stipulation made within 21 days of a proposed deadline to be extended must be supported by a showing of good cause. Good cause exists here because until June 26, 2023, Blue Chip intended to file a motion for summary judgment on or before July 7, 2023. However, the case settled on June 26, 2023 and, if Blue Chip's Good Faith Settlement Motion is granted, the dispositive motion will be unnecessary. Given the timing of settlement, it was not possible to request an extension within 21 days of the deadline.

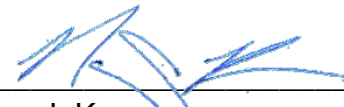
D. Proposed Schedule

Dispositive Motion Deadline as to Defendant Blue Chip only:

If the Good Faith Settlement Motion is denied, 30 days after denial thereof. If the motion is granted, no extension is necessary.

IT IS SO ORDERED.

Dated: July 10, 2023


Nancy J. Koppe
United States Magistrate Judge

1 **IT IS SO STIPULATED:**

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| 2 3 4 5 6 7 8 9 10 11 | <p>DATED this 7th day of July 2023</p> <p>GEORGE T. BOCHANIS, LTD.</p> <p><u>/s/ EUNICE M. BEATTIE</u> George T. Bochanis, Esq. SBN: 2262 Eunice M. Beattie, Esq. SBN: 10382 631 So. Ninth Street Las Vegas, NV 89101 Telephone: (702) 388-2005 Facsimile: (702) 388-0484 george@lvaccident.com eunice@lvaccident.com Attorney for Plaintiff, Mary A. Pool</p> | <p>DATED this 7th day of July 2023</p> <p>RESNICK & LOUIS, P.C.</p> <p><u>/s/ MATTHEW BECKSTEAD</u> Matthew Beckstead., SBN: 14168 8925 W. Russell Road, Suite 220 Las Vegas, NV 89148 Telephone: (702) 997-3800 Facsimile: (702) 997-3800 mbeckstead@rlattorneys.com Attorneys for Defendant, Macy's Retail Holdings LLC</p> |
| 12 13 14 15 16 17 18 19 20 21 | <p>DATED this 7th day of July 2023</p> <p>WOLFE & WYMAN LLP</p> <p><u>/s/ DAVID D. BLAKE</u> Scott R. Cook, Esq. SBN: 5265 David T. Blake, Esq. SBN: 11059 6757 Spencer Street Las Vegas, NV 89119 Telephone: (702) 476-0100 Facsimile: (949) 475-9203 dtblake@ww.law srcook@ww.law Attorney for Defendant, Blue Chip Commercial Cleaning 2000, Inc.</p> | |